

Law Offices of Ezra Spilke

3/23/23

1825 Foster Avenue, Suite 1K  
Brooklyn, New York 11230  
t: (718) 783-3682  
e: ezra@spilkelaw.com  
www.spilkelaw.com

March 22, 2023

**APPLICATION GRANTED  
SO ORDERED:**

**Vincent L. Briccetti, U.S.D.J.**

**Dated: 3/23/23  
White Plains, NY**

By ECF

The Honorable Vincent L. Briccetti  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *United States v. Morales et al.*, No. 22 Cr. 485

Your Honor:

With the consent of Pretrial Services and the government, Shonteea Walker requests a modification of her conditions of release to allow her to travel to Schenectady, New York, to visit her mother. On November 15, 2022, Magistrate Judge Davison set conditions of release including the following: a \$50,000 personal recognizance bond to be signed by two FRP'S, travel limited to SDNY/EDNY, and pretrial supervision as directed by Pretrial Services. The modification would modify the travel restriction beyond the SDNY and EDNY to include Schenectady, New York (which is in the Northern District of New York) and all points in between and would be for the purpose of allowing Ms. Walker to visit her mother.

Ms. Walker's mother seems to be a positive influence on Ms. Walker. It is my understanding that Ms. Walker's mother moved to Schenectady for a work opportunity and to gain some independence. The Court has authorized Ms. Walker to make this trip in the past.

Ms. Walker is in compliance with the conditions of her release. As noted, Supervisory Pretrial Services Officer Cynthia Labrovic has no objection to this request. I have conferred with AUSA Kaiya Arroyo, counsel for the government, who informs me that the government does not object to this request as long as Ms. Walker notifies Pretrial Services each time she intends to travel to the Northern District. Ms. Walker would consent to that condition.

In the alternative, should the Court defer ruling on this modification or deny it, Ms. Walker requests permission to travel to Schenectady from March 27 to 28, 2023, to visit her mother. Because Ms. Walker is eight-months pregnant, this should be the last visit Ms. Walker makes to her mother before giving birth.

Pretrial Services will be provided with the exact address where she will be staying, her travel itinerary, and other requested information. Thank you for your attention to this request.

Respectfully submitted,

*Ezra Spilke*

Hon. Vincent L. Briccetti  
Re: Walker Travel Request

March 22, 2023  
Page 2 of 2

Ezra Spilke

cc: Counsel of record, by ECF  
Andrew Abbott and Cynthia Labrovic, by email